

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE**

---

In re: RANDALL FELTS  
Debtor

Case No. 12-27573-L  
Chapter 13

---

**OBJECTION TO PROOF OF CLAIM 7 FILED BY CAPITAL RECOVERY GROUP, LLC AS  
AGENT FOR INSOLVE RECOVERY, LLC**

---

Comes now the debtor, by and through counsel of record, objecting to the proof of claim filed by Capital Recovery Group, LLC, as agent for InSolve Recovery, LLC, and stating:

1. The debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on July 19, 2012.
2. Capital Recovery Group, LLC, as agent for InSolve Recovery, LLC filed Proof of Claim 7, generally unsecured, in the amount of \$6,695.07. No supporting documentation was attached. The debtor alleges he owes no debt to either Capital Recovery Group, LLC or InSolve Recovery, LLC.
3. The debtor therefore proposes that the claim of Capital Recovery Group, LLC, as agent for InSolve Recovery, LLC be disallowed and that his plan payments be reduced accordingly.

WHEREFORE, the debtor moves the Court to sustain this objection and modify this plan accordingly.

Respectfully Submitted,

/s/ Herbert D. Hurst

Herbert D. Hurst 18721  
Hurst Law Firm, P. A.  
Attorney for Debtor(s)  
P. O. Box 41497  
Memphis, TN 38174-1497  
(901) 725-1000

---

**CERTIFICATE OF SERVICE**

---

The undersigned party, attorney for party, or agent therefore, hereby certifies that on this 11<sup>th</sup> day of July, 2013, copies of the above document were electronically mailed, mailed via the United States Postal Service, or hand delivered to the parties listed.

/s/ Meredith Thompson

Meredith Thompson, Legal Assistant  
Hurst Law Firm, P. A.  
Attorney for Debtor(s)  
P. O. Box 41497  
Memphis, TN 38174-1497  
(901) 725-1000

NAMES AND ADDRESSES OF ENTITIES SERVED:

Randall Felts  
3597 Hermitage Drive  
Memphis, TN 38116

Sylvia Ford Brown  
Chapter 13 Trustee  
200 Jefferson Avenue, Suite 1113  
Memphis, TN 38103

Capital Recovery Group, LLC.  
as agent for InSolve Recovery, LLC  
Dept. 3203  
P.O. Box 123203  
Dallas, TX 75312-3203

All Entities On Matrix